

exk

US District Court for the Eastern District of Texas (Sherman)

) Craig Cunningham

) Plaintiff, pro se

)

) v.

CIVIL ACTION NO.

Letter sent to DEF
Counsel

4:17-cv-00793

)

) CBC Conglomerate LLC, Bruce Phillip Hood, Carey Gorge Howe, USFFC Inc., Jay Singh,
and John/Jane Doe's 1-5

) Defendants.

**Plaintiff's Notice Regarding insufficient and deficient discovery responses and improper
objections**

1. Attached is my draft motion to compel being filed pursuant to rule 37 and in anticipation of our meet and confer regarding your discovery responses. Your responses are obviously improper on many levels. First, your interrogatory responses lack any sort of signature from anyone, and are not under oath or penalty of perjury.
2. You object citing privilege but fail to cite what documents you are refusing to produce, which privileges apply to them, and a corresponding privilege log. Please provide the documents requested and responsive answers to the questions or I will be forced to file the motion to compel and seek relief from the court


Craig Cunningham
Plaintiff,

Mailing address:

5543 Edmondson Pike, ste 248

Nashville, tn 37211

615-348-1977 10/4/2018

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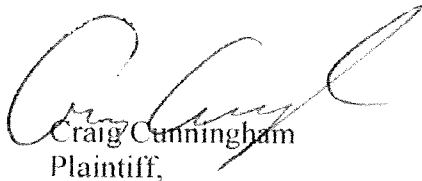
)

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) Defendants.

Plaintiff's Certificate of Service

1. I hereby certify that a true copy of the foregoing was mailed to the attorney's of record for the defendants on 10/4/2018 via USPS first class mail.


Craig Cunningham
Plaintiff,

Mailing address:

5543 Edmondson Pike, ste 248

Nashville, tn 37211

615-348-1977

10/4/2018